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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PORTIONS OF ITS
SUR-REPLY IN OPPOSITION TO
ANTHONY LEVANDOWSKI'S MOTION
FOR INTERVENTION UNDER RULE 24
AND MODIFICATION OF ORDER
GRANTING IN PART AND DENYING IN
PART PROVISIONAL RELIEF AND
EXHIBITS THERETO**

I, Lindsay Cooper, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal Portions of its Sur-Reply in Opposition to Anthony Levandowski’s Motion for Intervention Under Rule 24 and Modification of Order Granting-In-Part and Denying-In-Part Provisional Relief and Exhibits Thereto, filed concurrently herewith (the “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Sur-Reply in Opposition to Anthony Levandowski’s Motion for Intervention Under Rule 24 and Modification of Order Granting-In-Part and Denying-In-Part Provisional Relief (“Sur-Reply”)	Highlighted Portions	Defendants
Exhibits 2-3 to the Declaration of Patrick Schmidt (“Schmidt Decl.”)	Entire Documents	Defendants

3. Waymo’s Sur-Reply contains references to information that Defendants have designated as confidential, and Schmidt Decl. Exhibits 2-3 have been designated confidential by Defendants.

4. Waymo expects Defendants to file one or more declarations in accordance with the Local Rules.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on June 2, 2017.

4 By /s/ Lindsay Cooper
5 Lindsay Cooper
6 Attorneys for WAYMO LLC
7
8

9 **SIGNATURE ATTESTATION**

10 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
11 filing of this document has been obtained from Lindsay Cooper.

12 /s/ Charles K. Verhoeven
13 Charles K. Verhoeven
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